

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
South Jersey Ice and Cold Storage - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II**

Subject: **POLREP #6**
 Progress
 South Jersey Ice and Cold Storage
 A26W
 Vineland, NJ
 Latitude: 39.4895070 Longitude: -75.0235380

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From: Dwayne Harrington, On-Scene Coordinator

Date: 7/15/2016

Reporting Period: 7/15/2016

1. Introduction

1.1 Background

Site Number:	A26W	Contract Number:	EP-S2-15-01
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:		Operable Unit:	
Mobilization Date:	6/23/2016	Start Date:	6/23/2016
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	06/23/2016
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 Site Description

The site is a three-story ice manufacturing and cold storage facility in a downtown residential area of City of Vineland, and has been in operation since 1922. The current owner assumed operations around 1998. The facility's refrigeration system contains an estimated 4,500 to 5,000 lbs of anhydrous ammonia gas.

1.1.2.1 Location

The cold storage facility is located at 544 East Pear Street in Vineland, Cumberland County, New Jersey. It is situated within a densely populated residential neighborhood, and there are numerous residential homes and apartments as close as approximately 100 feet from the facility.

1.1.2.2 Description of Threat

Anhydrous ammonia is a CERCLA Extremely Hazardous Substance, a CAA 112(r) RMP Regulated Substance, and a US DoD and DOJ Category 1 Toxic Industrial Chemical (i.e., battlefield-deployable chemical weapon).

An inspection of the facility's refrigeration system by the City of Vineland Fire Department via a qualified consulting refrigeration engineer determined that the system is an extreme state of disrepair, to the extent that it presents an immediate threat to public safety. The engineer's recommendation is that since the necessary emergency repairs to the system would not likely be implemented in sufficient time, the ammonia should be immediately removed from the system to protect public and worker safety. EPA inspected the facility on June 23, 2016, and concurs with the concerns of the engineering report about the state of deterioration of the system and the immediate threat to public safety. An off-site consequence analysis by EPA determined that a worst-case release of ammonia from the facility would impact approximately 15,208 residents.

1.1.3

Preliminary Removal Assessment/Removal Site Inspection Results

On June 23, 2016, EPA conducted an inspection at the facility in response to a report that was prepared by a refrigeration engineer consultant of the City of Vineland Fire Department (VFD) detailing the deteriorating state of the ammonia refrigeration system. Concerns included the poor condition and location of pressure relief discharge vents relative to the immediate homes and surrounding community; it is suspected that the system contains anywhere from 4,500 – 12,000 pounds (lbs) of anhydrous ammonia. It was determined that the facility could not mitigate the threat posed by the deteriorated system to the surrounding community in a timely manner.

Based on these concerns, the VFD requested EPA assistance with responding to the threat that the cold storage facility's refrigeration system presents to the surrounding residential community.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA is continuing to respond to the deteriorating ammonia refrigeration system at a cold storage warehouse in a residential neighborhood. The facility's deteriorating ammonia refrigeration system (circa 1922) potentially contains 4,500 – 12,000 lbs of anhydrous ammonia gas liquefied under pressure, and presents a serious threat to the surrounding neighborhood should the system fail. Many sections of the ammonia system and the building have been frozen over, making the response more challenging. On June 28, 2016, EPA activated its Emergency and Rapid Response Services (ERRS) contractor to secure the system against a release and the Removal Support Team (RST) contractor to provide real-time 24/7 community air monitoring for ammonia gas. Several nearby residences have been evacuated.

As noted below, ERRS contractors have installed a scrubber system to protect it from a catastrophic release. Unified command has been established and EPA is currently planning for the removal of the ammonia and the decommissioning of the system. There is significant concern over the structural integrity of the building, which potentially will be made worse by the thawing of the ice surrounding parts of the ammonia system and building once the ammonia removal begins. The owner is attempting to remove all product, reportedly worth over \$1 million, from the facility before the ammonia removal begins.

2.1.2 Response Actions to Date

A Unified Command meeting was held this morning, 7/15/2016 to discuss the current situation at the facility. The facility owner continued to remove frozen product from the facility. The facility owner estimates there are 20 truckloads remaining in the facility and has scheduled the removal of 10 truckloads on Saturday, 7/16/2016 and the remaining 10 on Monday, 7/18/2016. At that point, the facility should not contain anymore frozen product.

A UC/Operations/Tactics Meeting will be held Sunday at 1000. The objective of the meeting is to review/approve the operational plan for the removal of the ammonia from the refrigeration system. Changes made to the HASP will also be reviewed.

EPA received the structural engineering report from Tetra Tech (EPA's contractor), the system assessment report from IRS (EPA's contractor) and the operational plan for the pump out of the ammonia from the refrigeration system from IRS. The documents were distributed to members of the UC and will be discussed at Sunday's meeting.

EPA has begun planning activities for handling, sampling, treating and potential disposal of melt water from the facility in the event the excessive ice load within the facility begins to melt and poses a threat to the structural integrity of the building.

EPA's refrigeration contractor is scheduled to be on site on Monday, July 18 to begin preparations for the removal of the ammonia from the refrigeration system.

PAD met with the relocated residents Friday morning at the main hotel to ensure a smooth transition as residents relocate to other accommodations for part of the weekend. Most residents accepting EPA assistance will return to the main hotel on Sunday, July 17. Accordingly, updated information is being provided to Vineland Fire Dept. for securing the homes while unoccupied. Fact Sheet # 3, dated July 12, was successfully uploaded to the Vineland Dept. of Health web site.

No media inquiries were received. During the previous 24 hour news cycle, the Press of Atlantic City published an article based on an interview the newspaper conducted with the facility's attorney. For reference, see: "No threat of ammonia gas leak at Vineland plant existed, attorney says," Press of Atlantic City, Barlas, Thomas, July 14, 2016.

A Unified Command meeting was held on 7/14/16, to discuss the current situation at the facility. EPA's refrigeration contractor is scheduled to be on site on Monday, July 18 to begin preparations for the removal of the ammonia from the refrigeration system. After discussions at the meeting this morning, the property owner has expressed interest in making the necessary repairs to the refrigeration system and did not grant EPA access to the facility to remove the ammonia. The owner continued frozen product removal and removed an approximate total of 178 pallets today. An estimated 530 pallets remain at the facility. Removal of the frozen product is anticipated to be completed Sunday, July 17, 2016.

EPA has installed an emergency aqueous scrubber system directly to a portion of the emergency relief vent system. EPA's refrigeration contractor is scheduled to begin preparations for ammonia removal from the system on Monday, 7/18/16. Preparations are expected to take two days. Following preparations, it is anticipated that approximately 85% of the ammonia will be removed within the first 48 hours of removal operations; this will reduce the threat of a significant off-site release. The removal of the remaining 15% will require approximately an additional week. EPA continues to negotiate access for this activity with the facility owner and his attorney. The amount of ammonia in the system has been estimated between 4,500 – 12,000 lbs.

EPA is working to have a refrigeration contractor inspect the system on-site daily following the initial assessment on July 11, 2016. It has been determined that the removal of the ammonia from the system and decommissioning of the system should occur as a time-critical, extremely controlled action. Additionally, a structural inspection of the building was performed. It was determined that there is adequate internal building support from an intact internal steel framework to prevent a catastrophic collapse of any of the internal floors or the roof; however, due to damage to wooden building joists, there are areas where ammonia lines are essentially supporting the floors above.

On July 12, 2016, EPA met with numerous agencies at the Cumberland County Emergency Operations Center. Meeting attendees included EPA, NJDEP, NJDOH, NJSP-OEM, Vineland Health Department, Vineland Fire Department/Office of Emergency Management, the Vineland City Attorney, Cumberland County Health Department and Cumberland County 911. The meeting was to discuss general conditions at the response operation, the structure of a Unified Command and upcoming operations at the facility. EPA updated all attendees about the status of the removal of frozen product from the facility, the expected timeframe to complete the unloading/shipping process and the timeframe for the evacuation of ammonia from the system. On July 12, 2016, a formal Unified Command structure was formed. Members of Unified Command include EPA, NJDEP, the Vineland Fire Department/OEM and the facility owner.

Product removal by the owner has been ongoing since the initial inspection on June 23, 2016, and is expected to be completed by Monday, July 18, 2016. On July 12 and 13, 2016, 17 truckloads of product were removed from the facility, and approximately 39 truckloads (708 pallets) of product remain. On July 12 and 13, 2016, the Unified Command met with the owner of the facility to discuss the continued removal of frozen product. Although a plan was developed for EPA contractors to assist in the loading of trucks with product and reviewed by EPA attorneys, the property owner stated, under the advice of his attorney, he would not allow EPA personnel or contractors on the facility to assist in frozen product removal operations.

EPA's RST contractor continues to perform 24/7 community and perimeter air monitoring for potential ammonia releases, and IMAAC continues to provide daily release projection updates.

The City of Vineland, including the Vineland Health Department, and the EPA Public Affairs Division (PAD) are continuing to conduct community outreach to educate residents on appropriate protective actions in the event of an ammonia release from the facility, and to keep residents informed of the situation. The VFD continues developing a community emergency notification and public protective action plan for the neighborhood. Fact Sheet # 3 (in English and Spanish) dated July 12, 2016 was

produced and provided to the City of Vineland for posting to the City's web site consistent with the previous Fact Sheets. The Fact Sheet was also sent to elected officials and to EPA's media list for the response.

Of the seven homes originally relocated, all remain relocated with the exception of one family of six that have chosen to return to their house and plan to remain there unless EPA suggests that they relocate once the ammonia extraction begins. Detailed information is being provided to the VFD for securing the homes while unoccupied. The relocation is expected to continue for two weeks or until 85% of the ammonia is removed from the system. The need for additional residential relocations and shelter-in-place advisories will be evaluated and implemented as necessary.

EPA PAD received a request and subsequently facilitated a conference call for OSC Neil Norrell to brief Richard Locklear, Special Projects Manager for Southern New Jersey of the Office of U.S. Senator Bob Menendez.

Press interest in the response remains high. On July 12, 2016, EPA PAD received three media inquiries regarding the site and responded to the inquiries. The inquiries were received from the Press of Atlantic City, the Vineland Daily Journal and New Jersey Advanced Media. On July 13, 2016, EPA PAD received and replied to two media inquiries from NJ TV and the Press of Atlantic City. During the current news cycle, interest is turning away from a lead story about an imminent risk, now that a response is underway, and toward the inconvenience and disruption of the relocated families.

For detailed information on response actions prior to July 12, 2016, see the previous POLREPS.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

RPB and ORC will determine if an Order or other enforcement action is necessary to ensure actions are taken immediately by the facility to ensure public safety.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

EPA continues to plan for the removal of the ammonia from the refrigeration system.

2.2.1.2 Next Steps

EPA will continue to monitor and oversee the facility's progress in removing product from the facility. EPA will continue to plan for securing the system against release and the removal of the anhydrous ammonia from the system. EPA will continue 24-hour community air monitoring throughout the duration of the response.

2.2.2 Issues

No issues were identified during this reporting period aside from the access issues detailed in the Operations section of this POLREP.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

On June 24, 2016, the EPA Emergency and Remedial Response Division Director issued a verbal authorization for \$250,000 to remove the pressurized liquid anhydrous ammonia from the high-pressure receiver and outdoor condensers.

On June 30, 2016, the EPA Emergency and Remedial Response Division Director issued a verbal authorization for an increase of funding to \$500,000 to continue the emergency removal action.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$450,000.00	\$0.00	\$450,000.00	100.00%
TAT/START	\$50,000.00	\$0.00	\$50,000.00	100.00%
Intramural Costs				
Total Site Costs	\$500,000.00	\$0.00	\$500,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

The Unified Command includes EPA, NJDEP, the Vineland Fire Department/OEM, the City of Vineland and the facility owner.

3.2 Cooperating Agencies

4. Personnel On Site

EPA: 3 OSCs, 1 PAD, 1 CIC

ERRS: 2

RST: 4

5. Definition of Terms

EPA: United States Environmental Protection Agency

ERRS: Emergency and Rapid Response Services

RST: Removal Support Team

VFD: City of Vineland Fire Department

IMAAC: Interagency Modeling and Atmospheric Assessment Center

PAD: Public Affairs Division

CIC: Community Involvement Coordinator

OEM: Office of Emergency Management

OSC: On-Scene Coordinator

OSHA: Occupational Safety and Health Administration

NJDEP: New Jersey Department of Environmental Protection

NJDOH: New Jersey Department of Health

NJSP-OEM: New Jersey State Police Office of Emergency Management

BER: Bureau of Emergency Response

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule

Polreps will continue to be distributed daily.

7. Situational Reference Materials

No information available at this time.